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10 Attorneys for Plaintiffs
11 ORACLE CORPORATION
and ORACLE AMERICA, INC.

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 ORACLE CORPORATION, a Delaware
17 corporation, and ORACLE AMERICA, INC., a
18 Delaware corporation,

19 Plaintiffs,

20 v.

21
22 ORG STRUCTURE INNOVATIONS LLC, a
23 Texas limited liability company, and PAUL
24 MORINVILLE, an individual resident of
Indiana,

25 Defendants.

CASE NO. 11-CV-3549 SBA

**STIPULATION AND ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO
FILE UNDER SEAL**

1 WHEREAS Defendant Morinville filed an Administrative Motion to Seal the Complaint in
2 this action on the grounds that it contains confidential information (Dkt. No. 7);

3 WHEREAS the Court issued an Order granting Defendant's Motion to Seal the Complaint
4 and directing that the Complaint be filed under seal (Dkt. No. 10);

5 WHEREAS the Court granted Plaintiffs' Motion for Leave to file a Motion for
6 Reconsideration of Docket No. 10 and ordered Plaintiffs to file their Motion for Reconsideration by
7 August 29, 2011;

8 WHEREAS Plaintiffs' Motion for Reconsideration of Docket No. 10 and the Declaration of
9 Clayton C. James in Support of Plaintiffs' Motion for Reconsideration of Docket No. 10 ("James
10 Declaration") refer to the Complaint and to the parties' prior briefing, also filed under seal, and
11 correspondence about whether the Complaint should be filed under seal and is moving this Court for
12 reconsideration of the Order sealing the Complaint;

13 WHEREAS Oracle does not believe that its Complaint or its Motion for Reconsideration or
14 the supporting James Declaration contains any information appropriate for filing under seal; and

15 WHEREAS in light of the Court's Order sealing Oracle's Complaint and out of an
16 abundance of caution, Oracle seeks to file its Motion for Reconsideration and the supporting James
17 Declaration under seal;

18 ACCORDINGLY, IT IS HEREBY STIPULATED AND AGREED that, with the Court's
19 permission, Plaintiffs may file under seal in accordance with Civil Local Rule 79-5 their Motion for
20 Reconsideration of Docket No. 10 and the Declaration of Clayton C. James in Support of Plaintiffs'
21 Motion for Reconsideration of Docket No. 10.

1 IT IS SO STIPULATED AND AGREED.

2 Dated: August , 2011

HOGAN LOVELLS US LLP

3 By: /s/ Maren J. Clouse

4 Maren J. Clouse

5 Attorneys for Plaintiffs
6 ORACLE CORPORATION
and ORACLE AMERICA, INC.

7 Dated: August , 2011

FARNEY DANIELS LLP

8 By: /s/ Steven R. Daniels

9 Steven R. Daniels

10 800 South Austin Avenue, Suite 200
Georgetown, Texas 78626

11 Attorneys for Defendants
12 ORG STRUCTURE INNOVATIONS LLC
13 and PAUL MORINVILLE

14 **ORDER**

15 Based on the foregoing, IT IS HEREBY ORDERED that Plaintiffs may file under seal in
16 accordance with Civil Local Rule 79-5 their Motion for Reconsideration of Docket No. 10 and the
17 Declaration of Clayton C. James in Support of Plaintiffs' Motion for Reconsideration of Docket No.
18 10.

19 IT IS SO ORDERED.

20 DATED: _8/30/11

21 

22 THE HONORABLE SAUNDRA BROWN ARMSTRONG
23 United States District Judge

24
25
26 I, Maren J. Clouse, attest that Steven R. Daniels has read and approved this Stipulation and Proposed
27 Order Granting Plaintiffs' Administrative Motion to File Under Seal and consents to its filing in this
action.